

Because neither Mani reference teaches or suggests a method for separating multivalent ions and lactate ions from a fermentation broth in which the broth, including both multivalent ions and lactate ions, is introduced to a first compartment of a cell, as required by independent claim 1, claim 1 and its dependent claims would not have been obvious over Mani 236 nor Mani 225.

For at least the above reasons, claims 1-11 are patentable over each of Mani 236 and Mani 225. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

**III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-16 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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